

Michael A. Tomasulo (SBN: 179389)  
*mtomasulo@winston.com*  
 David K. Lin (SBN: 278404)  
*dlin@winston.com*  
 Joe Netikosol (SBN: 302026)  
*jnetikosol@winston.com*  
 WINSTON & STRAWN LLP  
 333 South Grand Avenue, 38th Floor  
 Los Angeles, CA 90071  
 T: (213) 615-1700  
 F: (213) 615-1750

Dustin J. Edwards (*pro hac vice*)  
*dedwards@winston.com*  
 WINSTON & STRAWN LLP  
 800 Capitol Street, Suite 2400  
 Houston, TX 77002  
 T: (713) 651-2600  
 F: (713) 651-2700

Louis L. Campbell (SBN: 221282)  
*llcampbell@winston.com*  
 WINSTON & STRAWN LLP  
 255 Shoreline Dr., Suite 520  
 Redwood City, CA 94065  
 T: (650) 858-6500  
 F: (650) 858-6550

Attorneys for Defendant  
 Roku, Inc.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

Media Chain, LLC,  
  
 Plaintiff,  
  
 vs.  
  
 Roku, Inc.,  
  
 Defendant.

**Case No. 21-cv-09528-EMC**

**DEFENDANT ROKU'S STATUS REPORT<sup>1</sup>**

Judge: Hon. Edward Chen

<sup>1</sup> Defendant Roku, Inc. respectfully submits this status report non-jointly because Plaintiff Media Chain, LLC currently does not have counsel representing it in this matter (Dkt. 80) and the anticipated motion for sanctions or fee motion pertained to Morgan & Morgan, who is no longer representing Plaintiff Media Chain, LLC in this matter (Dkt. 80).

Defendant Roku, Inc. (“Roku”) by and through its undersigned counsel, respectfully files this status report in accordance with the Court’s May 18, 2022 order requiring a Joint Status Report due by August 23, 2022 (Dkt. 92).

The parties have settled this matter. The Court issued its Order of Dismissal with Prejudice granting Roku leave to file a “timely” motion for attorneys’ fees and costs against Morgan & Morgan, Media Chain’s former counsel (Dkt. 92). Roku filed its Administrative Motion for Clarification or Extension of Time (Dkt. 93) to allow time to meet and confer with Morgan & Morgan. Counsel for Roku and Morgan & Morgan then met and conferred June 14, 2022 and agreed to a two-week extension of time for Roku to file its Motion for Sanctions. Accordingly, Roku filed (Dkt. 94) and the Court granted (Dkt. 95) an Agreed Motion for Extension to File Motion for Sanctions. Furthermore, Roku respectfully informs the Court that it no longer intends to file a motion for sanctions or fee motion against Morgan & Morgan. Therefore, since Roku will no longer requires leave to file a fee motion and the Court has entered “final judgment” (Dkt. 92), Roku respectfully requests that the Court instruct the clerk of Court to close this matter.

Dated: August 19, 2022

WINSTON & STRAWN LLP

By: Michael A. Tomasulo  
 Michael A. Tomasulo  
 David K. Lin  
 Joe Netikosol  
 Winston & Strawn LLP  
 333 S. Grand Avenue  
 Los Angeles, CA 90071  
 Tel. (213) 615-1700  
 Fax (213) 615-1750  
[mtomasulo@winston.com](mailto:mtomasulo@winston.com)  
[dlin@winston.com](mailto:dlin@winston.com)  
[jnetikosol@winston.com](mailto:jnetikosol@winston.com)

Louis Campbell  
 Winston & Strawn LLP  
 255 Shoreline Drive, Suite 520  
 Redwood City, CA 94065  
 Tel. (650) 858-6500  
 Fax (650) 858-6550  
[llcampbell@winston.com](mailto:llcampbell@winston.com)

ATTORNEYS FOR DEFENDANT ROKU, INC.

**CERTIFICATE OF SERVICE**

**United States District Court for the Northern District of California**  
**Media Chain, LLC v. Roku, Inc.**  
**Case No. 21-cv-09528-EMC**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Winston & Strawn LLP, 333 S. Grand Avenue, Los Angeles, CA 90071-1543. On August 19, 2022, I served the following document(s):

**DEFENDANT ROKU INC'S STATUS REPORT**

**ECF:** by electronically filing the document(s) listed above using the Court's CM/ECF System, in accordance with the applicable Federal Rules of Civil Procedure and the Local Rules of this Court. A Notice of Electronic Filing (NEF) will be automatically generated by the CM/ECF system.



**EMAIL:** I transmitted PDF format copies of the document(s) described above to the email address below. The documents were transmitted by electronic transmission and such transmission was reported as complete and without error.

Michael F. Ram	<a href="mailto:Mram@forthepeople.com">Mram@forthepeople.com</a>
Philip N. Sanov	<a href="mailto:psanov@forthepeople.com">psanov@forthepeople.com</a>
William B. Lewis	<a href="mailto:wlewis@forthepeople.com">wlewis@forthepeople.com</a>
Arletys Hernandez	<a href="mailto:ahernandez@forthepeople.com">ahernandez@forthepeople.com</a>

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Signed: /s/ Michael A. Tomasulo

Dated: August 19, 2022